

2. Plaintiff is a resident of Johnson City, New York.

3. Defendant Bridgestone America, Inc. is a Nevada corporation with its principal place of business in Tennessee.

4. Defendant Bridgestone Retail Operations, LLC, doing business as Firestone Complete Auto Care, is a Delaware LLC with its principal place of business in Tennessee.

5. On or about January 22, 2018, Firestone Complete Auto Care was served with the Complaint.

6. On or about January 22, 2018, Bridgestone Americas, Inc. was served with the Complaint via its registered agent in New York.

7. On or about January 24, 2018, Bridgestone Retail Operations received the Complaint via regular mail postmarked January 4, 2018.

8. Defendants' Notice of Removal is timely under 28 U.S.C. §1446 because Defendants are filing this Notice of Removal within thirty (30) days of receipt, through service, of a copy of the Complaint.

9. Removal to the United States District Court for the Northern District of New York is proper under 28 U.S.C. §1446 because the Complaint was filed in the Supreme Court of the State of New York, County of Broome, which is located within the jurisdiction of this District.

REMOVAL PURSUANT TO 28 U.S.C. §1332

10. This matter is removable to this Court pursuant to 28 U.S.C. §1332. The State Court Action is between citizens of different States and the matter in controversy exceeds \$75,000. As such, this claim is within the Court's original jurisdiction, pursuant to 28 U.S.C. §1332 and properly removable to federal court pursuant to 28 U.S.C. §1441.

11. As required by §1446(a), true and correct copies of all process, pleadings, and orders served upon Defendants are being filed herewith.

12. Pursuant to 28 U.S.C. 1446(d), Defendants are filing written notice of this Notice of Removal with the Supreme Court of the State of New York, County of Broome, concurrently with the filing of this Notice of Removal, and will serve the same on counsel of record. A copy of the Notice of Filing Notice of Removal, in the form in which it will be filed and served, is attached here to as Exhibit 2.

WHEREFORE, Defendants request that this Court assume jurisdiction over this matter on removal from the Supreme Court of the State of New York, County of Broome.

Dated: New York, New York
February 21, 2018

HERRICK, FEINSTEIN LLP

By: s/Alan D. Kaplan
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*Attorneys for Defendants Bridgestone
Americas, Inc., Bridgestone Retail
Operations, LLC, and Firestone Complete
Auto Care*

CERTIFICATE OF SERVICE

I hereby certify that on February 21, 2018, I cause to be filed the foregoing document, the Notice of Removal and accompanying papers, with the Clerk of the Court via the CM/ECF system and the same was served on the following by Federal Express overnight, in accordance with the Federal Rules of Civil Procedures:

Ronald R. Benjamin, Esq.
Law Office of Ronald R. Benjamin
Attorney for Plaintiff
126 Riverside Drive, P.O. Box 607
Binghamton, New York 13902-0607

s/Alan D. Kaplan
Alan D. Kaplan